

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION**

KAREN AND MICHAEL MARTIN,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

KEYBANK NATIONAL ASSOCIATION,  
KEYCORP, and OVERBY-SEAWELL  
COMPANY,

Defendants.

Case No.: 2:22-cv-01346-RJC  
JUDGE ROBERT J. COLVILLE

**KEYBANK DEFENDANTS' UNOPPOSED MOTION TO STAY ACTION PENDING  
DISPOSITION OF PLAINTIFFS' MOTION FOR TRANSFER AND  
CENTRALIZATION PURSUANT TO 28 U.S.C. § 1407**

Defendants KeyBank N.A. and KeyCorp (“KeyBank Defendants”) hereby respectfully request that the Court stay this action pending a ruling by the Judicial Panel on Multidistrict Litigation (“JPML”) on Plaintiffs’ pending motion to transfer all related actions to this Court for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407. *See In re: KeyBank Customer Data Security Breach Litigation*, MDL No. 3056. Plaintiffs do not oppose the requested relief. For the reasons set forth in KeyBank Defendants’ concurrently filed memorandum in support, the Court should grant KeyBank Defendants’ motion to stay.

Dated: November 14, 2022

Respectfully submitted,

BAKER & HOSTETLER LLP

s/ Robert P. Leeson \_\_\_\_\_

Robert P. Leeson

PA Bar No. 327525

Edward J. McAndrew (admission pending)

PA Bar No. 77103

1735 Market Street

Suite 3300

Philadelphia, PA 19103

Telephone: (215) 568-3100

Facsimile: (215) 568-3439

[rleeson@bakerlaw.com](mailto:rleeson@bakerlaw.com)

[emcandrew@bakerlaw.com](mailto:emcandrew@bakerlaw.com)

*Counsel for Defendants KeyBank N.A. and  
KeyCorp*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2022, the foregoing was filed with the Clerk of the Court using CM/ECF, which will send notice to the registered attorneys of record that the document has been filed and is available for viewing and downloading.

s/ Robert P. Leeson  
Robert P. Leeson  
*Counsel for Defendants KeyBank N.A. and  
KeyCorp*